

REMARKS

Claims 20-24, 26-31, and 33 are pending. The Examiner's reconsideration of the rejections is respectfully requested in view of the remarks.

Claims 20-24, 26-31 and 33 have been rejected under 35 U.S.C. 102(e) as being unpatentable over Vitter (*Constrained Querying of Multimedia Databases: Issues and Approaches*). The Examiner stated essentially that Vitter teaches all the limitations of Claims 20-24, 26-31 and 33.

The Vitter reference is describing applicant's own work. A declaration under 37 CFR 1.132 is attached. Accordingly, Vitter is not believed to be prior art.

Reconsideration of the rejection is respectfully requested.

For the forgoing reasons, the application, including Claims 20-24, 26-31, and 33 is believed to be in condition for allowance. Early and favorable reconsideration of the case is respectfully requested.

Respectfully submitted,

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